

# DSM Chemicals North America, Inc.



1 Columbia Nitrogen Road  
P.O. Box 2451, Augusta, Georgia 30903  
Telephone (706) 849-6600, Telefax (706) 849-6999

201-16135

December 20, 2005

Administrator  
US Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attention: Chemical Right-to-Know Program

Certified Mail #70042890000310229829

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**RE: HPV Challenge Program**  
**Cyclohexanone Oxime CAS Number 100-64-1**

Dear Sir or Madam,

As stated in our June 28, 2005 letter, DSM Chemicals North America, Inc. (DCNA) has agreed to participate in the HPV Challenge Program by sponsoring Cyclohexanone Oxime (CAS No. 100-64-1). As part of this voluntary commitment, DCNA is required to submit robust summaries of existing study data, full citations of published studies, and a test plan for filling data gaps no later than December 31, 2005.

DCNA requests a sixty-day extension to the December 31, 2005 commitment date. This extension is needed in order to retrieve the existing study data and develop the robust summary and the test plan that will address those gaps. If approved, DCNA will submit this information to EPA no later than March 1, 2006.

A conference call was held on December 16, 2005 with Jeffrey Taylor and Walt Cybulski to discuss the December 6, 2005 letter regarding submission of completed data. As discussed in that call, DCNA is submitting this request although no policy has been established with respect to an extension for submission of completed data packages to the Agency.

If you have any questions or if you need additional information, please contact me at (706) 849-6395.

Sincerely,

Beth Connell  
Senior Environmental Engineer